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|----|---|--|--|
| 1  | PHILLIP A. TALBERT<br>United States Attorney  |  |  |
| 2  | ELLIOT WONG   |  |  |
| 3  | Assistant United States Attorney 501 I Street, Suite 10-100   |  |  |
| 4  | Sacramento, CA 95814<br>Telephone: (916) 554-2700   |  |  |
| 5  | Facsimile: (916) 554-2900   |  |  |
| 6  | Attorneys for federal Defendants  |  |  |
| 7  |   |  |  |
| 8  | IN THE UNITED STATES DISTRICT COURT   |  |  |
| 9  | EASTERN DISTRICT OF CALIFORNIA  |  |  |
| 10 |   |  |  |
| 11 | MEHRIA NAIM,  | CASE NO. 2:22-CV-01348-CKD                         |  |
| 12 | Plaintiff,  | STIPULATION AND ORDER FOR SECOND EXTENSION OF TIME |  |
| 13 | V.  |  |  |
| 14 | UR JADDOU, ET AL.,  |  |  |
| 15 | Defendants.   |  |  |
| 16 |   |  |  |
|    |   |  |  |
| 17 |   |  |  |
| 18 | The United States respectfully requests an additional 60-day extension of time in which to                |  |  |
| 19 | respond to the Complaint, and counsel for plaintiff does not oppose.                                      |  |  |
| 20 | This case concerns the humanitarian parole applications Plaintiff filed on behalf of four of her          |  |  |
| 21 | family members, which have been pending since October 11, 2021. Plaintiff recently submitted              |  |  |
| 22 | responses to U.S. Citizenship and Immigration Service's request for evidence. The parties anticipate      |  |  |
| 23 | that this litigation will be most once the agency completes its adjudication of Plaintiff's applications. |  |  |
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| 1  | The parties therefore stipulate that the new date for the defendants to file an answer or other dispositive |  |  |
|----|---|--|--|
| 2  | pleading is January 3, 2023. The parties further request that all other filing deadlines be similarly       |  |  |
| 3  | extended.   |  |  |
| 4  |   |  |  |
| 5  |   | Respectfully submitted,                            |  |
| 6  | Dated: November 3, 2022   | PHILLIP A. TALBERT                                 |  |
| 7  | ,   | United States Attorney                             |  |
| 8  | B   | y: /s/ ELLIOT C. WONG<br>ELLIOT C. WONG            |  |
| 9  |   | Assistant United States Attorney                   |  |
| 10 |   |  |  |
| 11 |   | /s/ JENNIFER ROZDZIELSKI                           |  |
| 12 |   | JENNIFER ROZDZIELSKI Counsel for Plaintiff         |  |
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| 14 |   |  |  |
| 15 |   |  |  |
| 16 |   | <u>RDER</u>  |  |
| 17 | It is so ordered.   |  |  |
| 18 | Dated: November 7, 2022   | Carop U. Delany                                    |  |
| 19 | <u></u>   |  |  |
| 20 | )   <b>   </b>  | AROLYN K. DELANEY<br>NITED STATES MAGISTRATE JUDGE |  |
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